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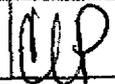
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Chairman

JIM IRVIN
Commissioner

MARC SPITZER
Commissioner

ARIZONA CORPORATION COMMISSION
Arizona Corporation Commission
DOCKETED

FEB 08 2002

DOCKETED BY 

IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
§ 271 OF THE
TELECOMMUNICATIONS ACT OF
1996.

DOCKET NO. T-00000B-97-0238

**NOTICE OF FILING ORIGINAL AFFIDAVIT
OF MAUREEN L. CALLAN IN SUPPORT OF
QWEST'S FILING ON LNP COST ESTIMATE
PURSUANT TO STAFF'S REPORT ON
CHECKLIST ITEM 11**

On February 7, 2002, Qwest's Filing on LNP Cost Estimate Pursuant to Staff's Report on Checklist Item 11 was filed with Docket Control, accompanied by a faxed copy of the Affidavit of Maureen L. Callan. Qwest hereby files said Affidavit with original signature of Maureen L. Callan in support of the Filing of February 7, 2002.

Respectfully submitted this 8th day of February, 2002.

By: 
Andrew D. Crain
John L. Munn
QWEST CORPORATION
1801 California Street, Suite 4900
Denver, CO 80202

Timothy Berg
Theresa Dwyer
FENNEMORE CRAIG
3003 North Central Avenue
Suite 2600
Phoenix, AZ 85012-2913

ATTORNEYS FOR QWEST CORPORATION

**ORIGINAL +10 copies filed this 8th day
Of February, 2002, with:**

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, AZ

COPY of the foregoing delivered this day to:

Maureen A. Scott
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Ernest Johnson, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Lyn Farmer, Chief Administrative Law Judge
Jane Rodda, Administrative Law Judge
Hearing Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ 85007

Caroline Butler
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

COPY of the foregoing mailed this day to:

Eric S. Heath
SPRINT COMMUNICATIONS CO.
100 Spear Street, Suite 930
San Francisco, CA 94105

Thomas Campbell
Lewis & Roca
40 N. Central Ave.
Phoenix, AZ 85004

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Ave., 21st Floor
PO Box 36379
Phoenix, AZ 85067-6379

Thomas F. Dixon
Worldcom, Inc.
707 17th Street # 3900
Denver, CO 80202

Scott S. Wakefield
Residential Utility Consumer Office
2828 North Central Ave., Suite 1200
Phoenix, AZ 85004

Michael M. Grant
Todd C. Wiley
Gallagher & Kennedy
2575 E. Camelback Rd.
Phoenix, AZ 85016-9225

Michael Patten
Roshka Heyman & DeWulf
400 East Van Buren Street
Suite 900
Phoenix, AZ 85004-3906

Bradley S Carroll
Cox Communications
20401 North 29th Avenue
Phoenix, AZ 85027-3148
Daniel Waggoner

Davis, Wright & Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688

Traci Grundon
Davis Wright & Tremaine
1300 S.W. Fifth Avenue
Portland, OR 97201

Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
1875 Lawrence Street # 1575
Denver, CO 80202

Gregory Hoffman
AT&T
795 Folsom Street
Room 2159
San Francisco, CA 94107-1243

David Kaufman
e.Spire Communications, Inc.
343 W. Manhattan Street
Santa Fe, NM 87501

Alaine Miller
XO Communications, Inc.
500 108th Ave. NE, Suite 2200
Bellevue, WA 98004

Diane Bacon, Legislative Director
Communications Workers of America
5818 N. 7th St., Suite 206
Phoenix, Arizona 85014-5811

Philip A. Doherty
545 South Prospect Street, Suite 22
Burlington, VT 05401

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338
Joyce Hundley

U.S. Dept. of Justice
Antitrust Division
1401 H Street, NW, # 8000
Washington, DC 20530

Andrew O. Isar
Telecommunications Resellers Association
4312 92nd Ave., NW
Gig Harbor, WA 98335

Raymond S. Heyman
Two Arizona Center
400 North Van Buren Street, Suite 800
Phoenix, AZ 85004-3906

Thomas L. Mumaw
Snell & Wilmer
One Arizona Center
Phoenix, AZ 85004-0001

Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, MD 20701

Gena Doyscher
Global Crossing Services, Inc.
1221 Nicollet Mall
Minneapolis, MN 55403-2420

Andrea Harris, Senior Manager
Allegiance Telecom, Inc. of Arizona
2101 Webster, Ste. 1580
Oakland, CA 94612

Gary L. Lane, Esq.
6902 East 1st Street, Suite 201
Scottsdale, AZ 85251
Kevin Chapman
SBC Telecom, Inc.
300 Convent Street, Room 13-Q-40
San Antonio, Texas 78205

M. Andrew Andrade
Tess Communications, Inc.

5261 S. Quebec Street Ste. 150
Greenwood Village, CO 80111

Richard Sampson
Z-Tel Communications, Inc.
601 S. Harbour Island, Ste. 220
Tampa, Florida 33602

Megan Doberneck
Covad Communications Company
7901 Lowry Boulevard
Denver, Colorado 80230

Richard P. Kolb
Vice President-Regulatory Affairs
OnePoint Communications
Two Conway Park
150 Field Drive, Suite 300
Lake Forest, Illinois 60045

Janet Napolitano, Attorney General
Office of the Attorney General
1275 West Washington
Phoenix, AZ 85007

Steven J. Duffy
Ridge & Isaacson, PC
3101 North Central Avenue
Suite 1090
Phoenix, AZ 85012



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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

IN THE MATTER OF QWEST)
CORPORATION'S COMPLIANCE WITH)
§ 271 OF THE TELECOMMUNICATIONS)
ACT OF 1996)
)
)
)

DOCKET NO. T-00000B-97-0238
AFFIDAVIT OF
MAUREEN L. CALLAN

STATE OF COLORADO)
)
COUNTY OF DENVER)

Maureen L. Callan, of lawful age being first duly sworn, deposes and states:

1. My name is Maureen L. Callan. I am Group Product Manager – Database Services, Global Markets for Qwest Services Corporation in Denver, Colorado. I am filing this Affidavit and the attached Exhibit pursuant to Staff's Supplemental Report on Checklist Item 11.

I. BACKGROUND

A. NANC Guidelines for Scheduling LNP Disconnects

2. The industry-developed LNP process flows , which were adopted by the North American Numbering Council ("NANC"), require that the old service provider disconnect service on the Due Date that is established by the new service provider. When Qwest began LNP deployment in July 1998, the disconnect time was automatically set for 8:00 p.m. on the Due Date for all Frame Due Times ("FDTs") prior to 8:00 p.m., or at the FDT if later than 8:00 p.m. The 8:00 p.m. disconnect time allowed additional time for the CLEC to contact Qwest in

the event that the CLEC was unable to activate the customer's service in its switch. Thus, this disconnect time provided CLECs an additional "cushion" while still meeting NANC guidelines.

3. Prior to the initial deployment of LNP, and throughout the deployment of LNP in 1998, 1999 and the first half of 2000, Qwest held workshops throughout its 14-state local region to ensure that CLECs were well-informed of the LNP ordering and provisioning processes. In addition, Qwest had ongoing dialogue with CLECs at carrier forums and in direct meetings and conference calls, and there were ongoing regional and national LNP operations team meetings where system and process issues were addressed. These avenues provided, and continue to provide, opportunity and impetus for the industry to develop and implement process improvements.

B. Late Notification of Due Date Changes and Cancellations

4. In preparation for the deployment of LNP, the industry developed systems and processes based on the NANC guidelines. Qwest has successfully interacted with more than eighty CLECs in the Qwest region in porting telephone numbers and coordinating Due Dates. Qwest has made every effort to accommodate late notifications. However, when Qwest is not notified until just a few minutes before the FDT, or several hours or even several days after the FDT, service has been disrupted, and Qwest is required to perform a "workback" and obtain facilities to put these end user customers back into service on an expedited basis.

5. To alleviate some of the workback volume, and to allow even more time for CLECs to complete their activations (or to notify Qwest if the port was not going to occur as scheduled), Qwest changed the disconnect time to 11:59 p.m. on the Due Date. This change took place in late 1999. The National Number Portability Operations ("NNPO") group addressed this issue in early 2000. Based on documentation that was submitted to the NNPO, some other

ILECs chose to charge CLECs for Due Date changes and cancellations. Qwest, however, did not impose such a charge.

II. EVALUATION OF TWO MECHANIZED SOLUTIONS

6. In February 2001, the Administrative Law Judge ("ALJ") in Washington issued her Draft Initial Order in Workshop II stating that "Qwest should wait until 11:59 p.m. of the day following the scheduled port before disconnecting." At that time, Qwest was porting an average of approximately 4,000 telephone numbers per business day. As a result, manually holding the orders would have been difficult to manage in the Interconnect Service Center ("ISC"). In addition, the receipt of supplemental service orders (e.g. due date changes) would require careful handling to ensure proper relating of revised orders and proper sequencing of orders.

7. Qwest formed a team of subject matter experts ("SMEs") to determine the best course of action to address the Washington order. The Qwest SMEs evaluated two mechanized solutions. One solution was to hold the disconnection of the switch translations and the service order until after 11:59 p.m. of the day after the due date, or the "Delayed Disconnect" solution. The other was to hold the order until receipt of the activation message from the NPAC, or the "Activate" solution.

8. Qwest determined that a mechanized Delayed Disconnect solution could be implemented quickly, would resolve the issue of disconnects when the CLEC failed to perform its provisioning work on the due date, and would not impose major impacts on Qwest's Service Order Processing systems ("SOPs"). The Activate solution, on the other hand, was not directly compliant with the Washington order, would require considerable vendor development for some LNP software, and would require extensive internal system development for the SOPs. Qwest would also be required to purchase hardware to support the internal and vendor software.

Accordingly, Qwest made the decision to move forward quickly with the Delayed Disconnect solution, while continuing to gather more information about the Activate solution.

III. IMPLEMENTATION OF THE DELAYED DISCONNECT SOLUTION

9. In March 2001, Qwest began work on an automated downstream system process to hold the disconnection of the switch translations associated with LNP orders. With this process, the APRIL (provisioning) system identified and intercepted the eligible port orders. The Due Date was extended for each port order, prior to sending the order to the MARCH (activation) system. The APRIL system alerted Switch Consultants that special due date processing had occurred. Qwest notified CLECs of the planned changes through the Change Management Process ("CMP"), and discussed the changes with them on CLEC conference calls that were held on May 16, 2001, and May 23, 2001.

10. An internal MCC (Multi Channel Communicator) was issued on June 1, 2001 advising the Qwest Wholesale functional groups, including Held Orders/Escalations, Order Processing and Order Resolution, as well as Repair and other work groups in Network, of the changes which were effective for any new port-out orders entering the system on:

June 1, 2001 Eastern Region

June 5, 2001 Central Region

June 7, 2001 Western Region

11. Effective Monday, August 20, 2001, with IMA Release 8.0, further automation allowed the LNP port orders to be issued with a delayed disconnect date, and an Effective Bill Date ("EBD") was established consistent with the CLEC's requested Due Date. With this release, both the switch translations and SOPs order completion are delayed. Qwest then discontinued the MARCH/APRIL interim solution.

12. Qwest notified CLECs of the August 20, 2001 changes and documented them in the Product Catalog. Qwest had planned to review this process change with the CLECs at a forum scheduled for September 12-13, 2001. However, that forum was cancelled as a result of the terrorist incidents in New York and Washington, D.C. On October 4, 2001, Qwest discussed these changes in a CLEC conference call.

13. The mechanized Delayed Disconnect solution exceeds the requirements that the industry agreed to via the Local Number Portability Administration ("LNPA") Working Group, which reports to the NANC. The LNPA Working Group addresses LNP issues on an ongoing basis through the Problem/Issues Identification & Management (PIM) Process. PIM Issue 0013 was introduced in mid-2001 to address the issue of customer disconnects prior to the port taking place. At the January 2002 LNPA Working Group meeting, the industry approved three options as acceptable solutions for this issue. The PIM documentation indicates that "any one of these approaches to preventing disconnect of the customer's switch translations prior to the port taking place is deemed acceptable." The NANC process flows are being updated by the LNPA Working Group to include the following text.

After update of its databases, the old Service Provider removes translations associated with the ported TN. The removal of these translations (1.) will not be done until the old Service Provider has evidence that the port has occurred, or (2.) will not be scheduled earlier than 11:59 PM of the day after the due date, or (3.) will be scheduled for 11:59 PM on the due date, but can be changed by an LSR supplement received no later than 9:00 PM local time on the due date. This LSR supplement must be submitted in accordance with local practices governing LSR exchange, including such communications by telephone, fax, etc.

IV. CONSIDERATION OF THE ACTIVATE SOLUTION

14. As Qwest implemented the Delayed Disconnect solution, Qwest also gathered information on the Activate solution that AT&T had suggested, a solution that purported to be similar to processes BellSouth had implemented.

15. Qwest developed a preliminary Order of Magnitude estimate of time and costs to implement a solution that would use the NPAC activation as the basis for triggering the disconnect process. The Order of Magnitude included an estimate for Qwest's development costs and for vendor software. Qwest provided the preliminary Order of Magnitude estimate to the Arizona Commission Staff in September 2001, under confidential cover.

16. Qwest also discussed potential solutions with two vendors who support LNP with software services. These vendors provided their estimates and solutions to Qwest under proprietary agreements.

17. Based on discussions with Qwest's Information Technologies LNP SMEs regarding both vendor proposals, Qwest would need to make significant changes to its SOPs to implement the Activate solution. In this regard, the Commission should note that many of Qwest's SOPs are different from BellSouth's SOPs. Currently, there are numerous enhancements being made to the SOPs in connection with the Third Party OSS tests as well as CMP requests. Thus, it is difficult to predict how implementation of the Activate solution at this time would affect Qwest's SOPs, if Qwest were ordered to provide the Activate solution, or how modifications to the SOPs would affect possible implementation of the Activate solution.

18. Qwest has updated the Order of Magnitude estimate to include the costs of the proposed vendor solutions, the estimated development costs for the impacted Qwest systems to the extent Qwest can predict those at this time, and the hardware costs associated with the

integration of the vendor software and Qwest's internal systems. The updated Order of Magnitude estimate is attached as Confidential Exhibit 1.

19. The total costs for implementing the Activate solution, based on the vendor costs and Qwest's preliminary cost estimates for integrating one of the proposed vendor solutions, are several million dollars. The costs identified in the Order of Magnitude estimate include hardware, which would likely range between \$.5M and \$1.2M. Qwest developed the software and hardware estimates based on preliminary system definitions with general assumptions regarding the overall architecture of the systems changes and process flows.

20. The earliest date that these changes could be implemented is nine to twelve months from completion of detailed design specifications. Qwest estimates that completion of these design specifications could take three to six months. The estimated implementation timeframe is based on the initial vendor responses, the time required for Qwest's internal systems development, the timing of the current SOPs enhancements that are underway and the potential availability of hardware.

21. If Qwest were to proceed with development of the Activate solution, detailed design discussions would need to take place with the selected vendor and internally within Qwest. The Activate solution would require significant changes to the Service Order Administration (SOAC) system, MARCH, and the LNP Service Management System (LSMS). No changes would be required to IMA, but internal development would be required for:

- the Flow Through System (FTS), to extend the Local Service Request Due Date
- Service Order Processing systems (SOPs), to accept an extended Due Date and place the date within the SOA messages; this is a critical deviation from the existing SOA interface specification
- LMOS, to complete Service Orders on the pending pass
- Loss & Completion (L&C) Reports, to convert pending pass to a completion pass

- CRIS, E911 and LIDB; assume no program changes but end-to-end testing will be required to ensure that SOPs interfaces are functioning correctly

22. There are also several outstanding issues and questions that need to be addressed with the vendors. For example, it is not clear: how multi-line or partial port orders will be handled, how the service orders will be processed when a correction ("COR") pass needs to be generated, whether MARCH will send the translation to the switch or whether complex translations or route indexes will be impacted, and so forth. Further investigation would be required to change current high-level assumptions into detailed design specifications. Once the detailed design specifications have been completed, a more definitive development timeline and implementation schedule could be developed.

V. TIMELINESS OF DISCONNECTS

23. Qwest previously presented interim results of its disconnect performance to Staff and the Commission in September, 2001. The first results for the new OP-17 measurement have now been issued and are available on the Qwest website at the following address:

<http://www.qwest.com/wholesale/results/>. The OP-17 performance data for October through December 2001 confirms that the mechanized solution Qwest implemented has been effective in resolving the LNP disconnect coordination issue. Following are the individual state and regional results:

OP-17	October 2001		November 2001		December 2001	
State	%	Misses	%	Misses	%	Misses
AZ	99.98	1	99.98	2	100	
CO	100		99.98	1	100	
ID	100		100		100	
IA	100		100		100	
MN	99.99	1	100		99.96	3
MT	100		100		100	

OP-17	October 2001		November 2001		December 2001	
State	%	Misses	%	Misses	%	Misses
NE	99.97	1	100		100	
NM	100		100		100	
ND	100		100		100	
OR	100		100		99.91	4
SD	100		100		100	
UT	99.97	1	100		99.98	1
WA	100		100		99.95	4
WY	NA*		NA*		NA*	
REGION	99.99	4	99.99	3	99.98	11
TNs Ported	43,933		45,527		52,576	

*No TNs ported in WY during 4th Qtr. 2001

24. There is no indication that Qwest's performance for timeliness of disconnects would be improved or that there would be less disruption of service with the Activate solution. Basing the disconnect activity on the CLEC's NPAC subscription activation provides no additional assurance that service for the end user customer has actually been activated in the CLEC switch. For example, Qwest often receives escalation calls to the ISC from CLECs that have activated the port in the NPAC database and then discover that they are either unable to provision the service in their switch or are experiencing problems with their loop.

25. When the CLEC sends its activation to the NPAC but is unable to provision service, the end user customer is out-of-service if the old service provider has worked the disconnect based on the activation message. Based on discussions at the industry LNP meetings, this is a significant problem with the Activate solution. In some cases, when the customer is out-of-service, trouble reports are received from the end user customer, instead of from the CLEC. The CLEC controls the NPAC record and activation, so Qwest would not be able to modify the subscription in the NPAC.

26. Furthermore, based on the completed service order, the facilities associated with the telephone number ("TN") being ported are released in the downstream operations systems, and are available for reassignment to other customers. Depending on how long it takes the CLEC to notify Qwest of the CLEC's failure to provision service, those facilities may be reassigned, making the restoration of service difficult.

27. Based on discussions at the industry LNP meetings, other problems may be experienced with the Activate solution:

- a. Orders are cancelled with no notification by the CLEC. In this case, the service order remains in pending status indefinitely, waiting for the NPAC activation message. During that indefinite period of time, Qwest may receive a subsequent order for that end user customer from either a different CLEC for LNP, or for resale service or from Qwest's retail operations. The subsequent order is rejected by the SOPs, due to the original pending LNP order. Eventually, as a result of a complaint from the end user customer or another CLEC or a Reseller, or during an investigation of orders not completed in the SOPs, there will be a referral to wholesale to resolve the order issue. Qwest must then contact the CLEC to determine why the subscription was not activated.
- b. Orders may include multiple telephone numbers, where no activation is received for one or more of the numbers. Because not all numbers are activated by the CLEC in the NPAC, the Qwest LNP order remains in pending status and requires manual investigation. Qwest must contact the CLEC to determine whether the number should be disconnected, or whether the end user customer wants Qwest to continue service for the telephone number(s). This may cause billing problems. It may also result in held orders for other customers (wholesale or retail) where the facilities associated with the pending disconnect order might have been used.

28. The real key, with any solution, is communication. As described above, even with the Activate solution, problems may be experienced that could be resolved with communication between the service providers. In any event, Qwest makes every effort, even when notified late, to ensure that a customer's service is not disrupted, or that service is restored as soon as possible in the event that it is disrupted. In those situations where the CLEC is unable to complete its installation, it is critical that the CLEC communicate with Qwest, to ensure that the end user customer's service is not disconnected.

I hereby swear and affirm that the information contained herein is true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

Maureen L. Callan

Maureen L. Callan

SUBSCRIBED AND SWORN to before me this 7th day of February, 2002.

Candace A. Mowbray

Notary Public residing at
Denver, Colorado

My Commission Expires:

April 13, 2002